

**U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: ARTHUR L. OLIVER : CHAPTER 13
Debtor(s) : BANKRUPTCY NO. 17-10207-AMC

MOTION TO MODIFY CHAPTER 13 PLAN

Debtor(s), Arthur L. Oliver, hereby moves this Court to modify the Chapter 13 plan on the following grounds:

1. The Debtor filed a Chapter 13 bankruptcy on January 11, 2017.
2. The Debtor thereafter submitted his Third Amended Chapter 13 Plan on October 13, 2017.
3. The above case was Confirmed on December 14, 2017.
4. Since the Confirmation of this case, the Debtor has experienced a financial hardship result of COVID-19. Specifically, his hours and therefore his income was reduced as a result of the COVID-19 pandemic.
5. Additionally, Debtor's daughter, who was contributing to the household income, was also negatively impacted by COVID-19 and could not continue with her contribution.
6. The Debtor and his daughter have now returned to part-time employment and can continue to move forward with this new proposed Plan.
7. The Debtor now desires to extend the term of his Chapter 13 Plan pursuant to 11 U.S.C. § 1329(d), which allows for his Confirmed chapter 13 plan to be modified and the term extended beyond the original five-year commitment period.
8. A copy of the proposed Fourth Amended Chapter 13 Plan is attached hereto as

Exhibit A. The proposed plan is 66 months in length, and does not reduce funding to the Trustee or any Creditors.

9. The total Plan funding will remain unchanged. Debtor believes no parties shall be aggrieved upon the granting of this Motion.

WHEREFORE, the Debtors request that this Court allow debtors to Modify the plan and file a Third Amended Plan.

Respectfully submitted,

YOUNG, MARR & ASSOCIATES

/s/ Paul H. Young
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